

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Michael A. Boehler and
Jill M. Boehler,

Debtors

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Case No. 5-16-bk-03293-RNO

Ch. 13

Answer to Motion for Relief

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Denied as stated. Debtor believes that that August, 2018 and September, 2018 payments have been paid as of this date.

6. Denied and proof demanded.

7. Denied. There is no significant default in the payment agreement and Movant has been adequately protected by the stream of payments that have been paid.

8. Denied.

WHEREFORE, the Debtors request that the Motion for Relief from Stay be denied.

DORAN & DORAN, P.C.

BY: /s/ Lisa M. Doran

LISA M. DORAN, ESQUIRE
PA. ID# 58879
Attorney for Debtors
69 Public Square, STE 700
Wilkes-Barre, PA 18701
(570) 823-9111

Dated November 12, 2018

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Certification of Service

The undersigned, Lisa M. Doran, of Doran & Doran, P.C., 69 Public Square, Suite 700, Wilkes-Barre, Pennsylvania 18701 hereby certifies that on November 12, 2018 a copy of the foregoing, *Answer to Motion for Relief*, was served electronically through ECF on the parties listed below.

Charles J. DeHart, III, Trustee
dehartstaff@pamd13trustee.com
TWecf@pamd13trustee.com

James C. Warmbrodt, Esquire
jwarmbrodt@kmlawgroup.com

Dated November 12, 2018

Signed: *Lisa M. Doran*

Lisa M. Doran, Esquire